

September 15, 2015

VIA ECF

Hon. Steven C. Mannion
United States Magistrate Judge for the District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street, Court Room MLK 5C
Newark, New Jersey 07101

Re: *Trzaska v. L'Oreal USA, Inc., et al.*, Civil Action No. 15-2713 (SDW) (SCM)

Dear Magistrate Judge Mannion:

We represent L'Oreal, S.A., a defendant in the above matter. We write to confirm the conversation that I had with Your Honor's Chambers on September 10, 2015 regarding the Order entered by the Court on August 25, 2015 (Dkt. No. 34) and my letter of September 1, 2015 (Dkt. No. 36).

As a result of the above Order, our motion to dismiss the Complaint and First Amended Complaint pursuant to Rule 12(b)(5) and for a stay of time in which to move to dismiss for lack of personal jurisdiction (Dkt. No. 30) has been terminated. As I advised Chambers, we intend to move for the same relief with respect to the First Amended Complaint. Chambers instructed us to re-file the motion, limiting our request for relief to the latter pleading. Our intention is to file the motion on or before October 9, 2015, the filing date for the November 2, 2015 return date

By copy of this letter, we are advising all counsel of the above developments and new schedule

We remain available for any conferences or questions that Your Honor may deem necessary.

Respectfully yours,



Eric A. Savage

cc: Hon. Susan D. Wigenton, U.S.D.J.
Gerard J. Jackson, Esq.
Christopher B. Carton, Esq.